

EXHIBIT D

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY
3 Case No. 2:19-md-02904-MCA-MAH
4

5 IN RE: AMERICAN MEDICAL COLLECTION)
6)
7 AGENCY, INC., CUSTOMER DATA)
8)
9 SECURITY BREACH LITIGATION)
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11 VIDEOTAPED and REMOTE DEPOSITION OF
12 JEFFREY S. WOLLMAN
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14 DATE: February 19, 2023
15 TIME: 9:03 a.m.
16 PLACE: DoubleTree by Hilton Hotel Norwalk
789 Connecticut Avenue
Norwalk, Connecticut
17
18 By: Sarah J. Miner, RPR, LSR
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1 A P P E A R A N C E S:

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5 and

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Also Present

Rocco Mercurio, Videographer

1 THE VIDEOGRAPHER: We are now going
2 on the record. Today is February 19,
3 2023, and the time is approximately 9:03.
4 This is the video deposition of Jeffrey
5 Wollman in the matter of In Re: American
6 Medical Collection Agency, Quest, filed in
7 the U.S. District Court of New Jersey,
8 Docket Number 19-md-2904-DMJ.

9 My name is Rocco Mercurio, and the
10 court reporter is Sarah Miner, and we are
11 with Veritext. We are located at the
12 Doubletree by Hilton Hotel in Norwalk,
13 Connecticut.

14 All appearances will be noted on the
15 stenographic record.

16 The court reporter will now swear in
17 the witness and we can proceed.

18 JEFFREY S. WOLLMAN,
19 having first been duly sworn by Sarah J. Miner,
20 LSR, a Notary Public in and for the State of
21 Connecticut, was examined and testified as follows:

22 DIRECT EXAMINATION

23 BY MR. BROWN:

24 Q Mr. Wollman, my name is William Brown. We
25 met just a few minutes ago. I represent a company

1 THE WITNESS: The company -- I would
2 say the original system of the company was
3 the mainframe oriented system. And all
4 client reporting, or most of it came from
5 that system. So it was the primary source
6 of incoming data from clients. It
7 processed all of our files that would be
8 used for sending debt collection letters
9 to consumers.

10 So its main functions were to be
11 primary -- to be the primary system of the
12 company, housing information for client
13 reporting, letters, transactions to be
14 posted to customer accounts. That was the
15 main system of record, I would call it.

16 BY MR. AYERS:

17 Q So earlier -- earlier, you had -- there
18 was some testimony related to HCFA's.

19 And could you describe what are those
20 forms?

21 A The HCFA 1500 form is a document that --
22 especially before electronic insurance filing, was
23 used to disseminate billing information to submit
24 to an insurance carrier for payment. And it also
25 served as -- dual purpose. It also served as an

1 itemized statement of services provided. So that
2 could be provided to a consumer, debtor.

3 Q So when you are describing the mainframe
4 system, would the data that is in the mainframe
5 system be used to fill out those HCFA forms?

6 MR. COOKE: Objection to form.

7 THE WITNESS: Yes, I believe that the
8 mainframe system was used to create the
9 files for those HCFA 1500 forms.

10 BY MR. AYERS:

11 Q And then -- and then on the other side,
12 there was the non-mainframe database, which was
13 CHAMP?

14 MR. COOKE: Objection.

15 MS. SULTANIAN: Objection as to form.

16 BY MR. AYERS:

17 Q Is that correct?

18 A It was a system that was developed for
19 other collection purposes, correct.

20 Q So just so we get the record clear. So
21 there was a mainframe system that was used for the
22 reporting and what you just described and then
23 there was the non-mainframe portion.

24 And what -- what did the non-mainframe
25 portion consist of?

1 Q Was -- did AMCA use CHAMP as a means of
2 distinguishing itself from its competitors?

3 A I don't know the answer to that.

4 Q Do you know if AMCA ever marketed itself
5 to defendants with CHAMP?

6 A I am not aware of that.

7 Q By design, CHAMP is designed to be
8 accessed from the internet. Correct?

9 MR. COOKE: Objection to form.

10 THE WITNESS: Not being technical, I
11 think there were portions of CHAMP that
12 were internal, meaning only internal
13 employees had access to certain things.
14 Externally, I believe certain clients may
15 have had access into their patient
16 accounts on that system.

17 And then I believe consumers could
18 make a payment through a secondary system
19 of CHAMP, you know, as a payment portal to
20 make payments.

21 BY MR. AYERS:

22 Q And CHAMP was designed to speak with
23 various other parts of AMCA networks?

24 MS. SULTANIAN: Objection to form.

25 MR. COOKE: Objection to form. Lacks